

## IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF DELAWARE

REMOTE SOLUTION CO., LTD.,	)	
	)	
Petitioner,	)	
	)	
v.	)	Civil Action No. 06-004 KAJ
	)	
FGH LIQUIDATING CORP. f/k/a	)	
CONTEC CORPORATION,	)	
	)	
Respondent.	)	

**STIPULATION AND [PROPOSED] ORDER**

On January 3, 2006, petitioner Remote Solution Co., Ltd. (“Remote Solution”) filed a Motion to Vacate or Modify Arbitration Awards in the above-captioned action. Remote Solution did not file an opening brief with its motion, but stated, on page 4 of its motion, that it would “set forth its arguments and authorities in support of [its] motion in a supporting brief and appendix to be filed separately, upon obtaining an Order from the Court permitting the filing of certain exhibits under seal.” The parties expect to file a proposed protective order with the Court shortly, governing the filing of documents under seal.

In view of the fact that Remote Solution’s opening brief for its pending motion has not yet been filed, it is hereby stipulated by the parties, through their undersigned counsel, subject to approval of the Court, that:

1. Remote Solution shall file and serve its opening brief in support of its motion on or before February 15, 2006;
2. Respondent, FGH Liquidating Corp., f/k/a Contec Corporation, shall file and serve its answering brief and/or other response on or before March 1, 2006; and

3. Remote Solution shall file and serve its reply on or before March 8, 2006.

/s/ David L. Finger  
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Attorney for Respondent

**SO ORDERED** this \_\_\_\_\_ day of February, 2006

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Jordan, J.